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17 Attorneys for Plaintiff Stanmore C. Cooper

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 SAN FRANCISCO DIVISION

22 STANMORE C. COOPER, ) No. C 07-1383 VRW

23 Plaintiff, )

24 v. )

25 FEDERAL AVIATION )

ADMINISTRATION; SOCIAL SECURITY )

26 ADMINISTRATION; UNITED STATES )

DEPARTMENT OF TRANSPORTATION, )

27 )

Defendant.

28 **STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DEADLINES**

1

2 **STIPULATION**

3 1. On December 5, 2007, the parties stipulated to extend the deadlines for fact and expert  
4 discovery, and dispositive motions because they were in the process of arranging for a private  
5 mediation to attempt to resolve the case.

6 2. On December 12, 2007, the Court ordered new deadlines as follows:

7 Fact Discovery Cut-Off: January 31, 2008

8 Dispositive Motions Cut-Off: February 7, 2008

9 Dispositive Motions Hearing: March 20, 2008

10 Expert Disclosure: March 17, 2008

11 Expert Discovery Cut-Off: April 28, 2008

12 Pretrial Conference: May 8, 2008

13 3. Almost all fact discovery has been completed. However, the parties have identified  
14 several remaining discovery issues. Also, defendants have agreed to re-open a deposition. That  
15 deposition is currently scheduled for January 31, 2008. Given the outstanding discovery issues  
16 and the upcoming deposition, the parties seek a brief extension of time to seek resolution of their  
17 remaining discovery disputes and to obtain the transcript of the upcoming deposition prior to  
18 filing any dispositive motions. For these reasons, the parties stipulate to extend the dispositive  
19 motions and expert discovery deadlines as follows:

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1 Dispositive Motions Cut-Off: March 13, 2008

2 Dispositive Motions Hearing: April 17, 2008

3 Expert Disclosure: April 16, 2008

4 Expert Discovery Cut-Off: May 28, 2008

5 Pretrial Conference: June 12, 2008

6 No trial date has been set.

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8 IT IS SO STIPULATED.

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10 DATED: January 23, 2008

Respectfully submitted,

11  
12 JOSEPH P. RUSSONIELLO  
United States Attorney

13  
14 /s/  
JENNIFER S WANG  
Assistant United States Attorney

15  
16 DATED: January 23, 2008

REED SMITH, LLP

17  
18 /s/  
JAMES M. WOOD  
19 Attorneys for Plaintiff Stanmore C. Cooper

1 **[PROPOSED] ORDER**  
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34 Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:  
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7 1. The last date for dispositive motions hearing is extended to April 17, 2008  
8 2. The deadline for expert disclosures is extended to April 16, 2008  
9 3. The expert discovery cut-off date is extended to May 28, 2008  
10 4. The Pretrial Conference is set for June 12, 2008. at 3:30 p.m.  
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1213 IT IS SO ORDERED.  
1415 DATED: 1/25/2008  
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